

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 21cr10065
)	
v.)	Violation:
)	
MASSIMO MARENGHI,)	<u>Count One:</u> Use of Interstate Commerce
)	Facilities in the Commission of Murder-for-Hire
)	(18 U.S.C. § 1958(a))
Defendant)	
)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 981(a)(1)(C) and
)	28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire
(18 U.S.C. § 1958(a))

The Grand Jury charges:

On or about January 29, 2021, in the District of Massachusetts and elsewhere, the defendant,

MASSIMO MARENGHI,

traveled in interstate commerce with intent that the murder of Victim 1, a person known to the Grand Jury, be committed in violation of the laws of the Commonwealth of Massachusetts as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1958(a), set forth in Count One, the defendant,

MASSIMO MARENGHI,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


ADAM W. DEITCH
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: February 23, 2021
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK

2/23/2021 @ 2:13pm